

Schiller & Knapp, LLP  
950 New Loudon Road  
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ws 3360

Return Date:

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

**NOTICE OF MOTION FOR  
RELIEF FROM AUTOMATIC STAY**

**In re:**

**Lehman Brothers Holdings, Inc.,**

Debtor

Case No. 08-13555-jmp  
Chapter 11  
HON. JAMES M. PECK

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**PLEASE TAKE NOTICE**, that upon the annexed Request for Relief of Schiller & Knapp, LLP local counsel to McCalla, Raymer, LLC attorneys for Wells Fargo Bank, NA, d/b/a America's Servicing Company as servicer for U.S. Bank National Association, as Trustee for the Structured Asset Investment Loan Trust, Series 2005-HE3 (hereinafter "The Trust"), the undersigned respectfully moves this Court for an order, pursuant to **11 U.S.C. Section 362(d)(1)** modifying the automatic stay herein to permit The Trust or its assigns to proceed with an action to foreclose on the real property owned by Rick Kealoha Pa, Jr., commonly known as 95-213 Akuli Pl, Millilani, Hawaii and such other and further relief as to the Court may seem just and proper.

**PLEASE TAKE FURTHER NOTICE**, that this motion shall be returnable on the **14<sup>th</sup> day of September at 10:00 a.m.** o'clock in the forenoon of that day, before the Hon.

James M. Peck, or as soon thereafter as counsel can be heard, at 1 Bowling Green, 6<sup>th</sup> Floor,  
Room 601, New York, NY

**PLEASE TAKE FURTHER NOTICE**, that answering papers, if any, must comply with the Federal Rules of Bankruptcy Procedure, shall be filed with the Court and served upon and received by Schiller & Knapp, LLP, attorneys for The Trust, at their offices located at 950 New Loudon Road, Latham, New York 12110, Attention: William B. Schiller, Esq., so that they are received no later than three (3) business days before the hearing on the Motion.

**PLEASE TAKE FURTHER NOTICE**, that the hearing may be adjourned from time to time without further notice other than the announcement of such adjournments in open Court.

Dated: August 1, 2011

/s/ William B. Schiller  
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